



**U.S. Army Corps of Engineers  
Los Angeles District**

**Engineering Evaluation and Cost Analysis  
Final Action Memorandum**

**Former Camp Ibis  
San Bernardino County, California**

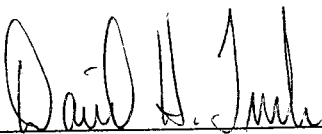
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**US Army Engineering & Support Center, Huntsville**

**ENGINEERING EVALUATION AND COST ANALYSIS  
ACTION MEMORANDUM  
FORMER CAMP IBIS  
SAN BERNARDINO COUNTY, CALIFORNIA**

**FOREWORD**

This Engineering Evaluation and Cost Analysis (EE/CA) Action Memorandum document represents the selected ordnance and explosives (OE) response actions for the former Camp Ibis, San Bernardino County, California. The selected response actions are in accordance with the final EE/CA. The United States Army Corps of Engineers (USACE) is the executing agency under the Defense Environmental Restoration Program (DERP), and developed this EE/CA Action Memorandum in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) as amended; and is consistent with the National Contingency Plan (NCP). The selection of OE response actions is based on the information contained in the administrative record for this site. This document has been approved by the undersigned.



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David H. Turk  
Colonel, US Army  
Acting District Engineer

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## 1.0 INTRODUCTION

The United States Army Corps of Engineers, Engineering and Support Center, Huntsville (USAESCH) issued a contract to Parsons for conducting an EE/CA at the former Camp Ibis, San Bernardino County, California. In order to fulfill the contract requirements, Parsons conducted an EE/CA of three areas of interest (AOIs) located within the former Camp Ibis, as designated in the Archives Search Report (ASR, USACE 1996) and final Statement of Work (SOW, 14 February 2003). The results of the EE/CA investigation were presented in the Final EE/CA Report (Parsons, April 2004). This document presents the selected OE response actions for the three AOIs which do not include the physical removal of explosives to eliminate ordnance hazards but rather consist of management of residual risk via implementation of institutional controls strategies.

## 2.0 BACKGROUND

2.1. The former Camp Ibis (the Camp) is a formerly used defense site (FUDS) located in San Bernardino County, California approximately 21 miles northwest of Needles, California (Figure 1). For purposes of the ordnance and explosives (OE) engineering evaluation/cost analysis (EE/CA) characterization study, the Camp comprises approximately 13,398 contiguous acres situated roughly between the Homer Mountains on the west and the Dead Mountains on the east. U.S. Highway 95 passes through the western side of the Camp.

2.2 The former Camp Ibis (the Camp) was one of ten major divisional Camps established in March 1943 as part of General George S. Patton Jr.'s 12 million acre California-Arizona Maneuver Area (CAMA). The primary objective of Camp Ibis was to train combat troops for desert warfare, as well as the testing of equipment, ammunition, and weapon systems. During the time that Camp Ibis was in operation (1942-1944), various armor divisions were trained at the site. Camp Ibis consisted of a large cantonment area with as many as twenty-three adjacent maneuver and "live-fire" training ranges in the Mojave Desert; however, only four of the artillery impact ranges originated from within the proximity of the main Camp (Camp Ibis Proper) borders. The Camp also gave priority to testing equipment, ammunition, weapon systems and supplies. The M3 Stewart, M3 Grant and M4 Sherman tanks were operated during training using both practice and live ammunition to provide a sense of real combat situations. Munitions used during training included 37mm, 75mm, and 76mm high velocity projectiles (for tank guns), 40mm through 155mm howitzer-fired projectiles, hand grenades, and practice landmines. In 1964, the CAMA area (including the former Camp Ibis) was used to conduct a military exercise code named Desert Strike.

2.3 Today the site remains remote and undeveloped, aside from U.S. Highway 95 that runs north to south through the western edge and the Atchison, Topeka and Santa Fe Railroad that crosses the southern perimeter of the former Camp. A concrete monument with brass plaque is the only identifier of the Camp along U.S. Highway 95. Historic rock alignments (primarily in the cantonment area), a concrete 50,000-gallon water reservoir, and an abandoned landing strip (outside the western boundary) comprise the extent of the

man-made features that still remain indicating prior military use of the site. The primary land owner is the Department of the Interior, Bureau of Land Management (BLM), with other ownership by the State of California, the City of Needles, Cadiz Land Company, Inc., and various railroad entities. The land to the east of and including Piute Wash (within the project area) is designated as the Dead Mountains Wilderness Area. As such, public land use is limited under the BLM and the California Desert Protection Act of 1994. Public use of this area is significantly restricted, with use of motorized vehicles prohibited for land east of Piute Wash. The area is known to be periodically used for upland game hunting with hunters traversing the area from within Piute Wash.

2.4 The U.S. Army Corps of Engineers (USACE), U.S. Army Defense and Ammunition Center and School, and the USACE Rock Island District conducted a records search and reconnaissance of the project site in April 1996. The findings are documented in the Archives Search Report (ASR) and ASR Supplement (USACE, 1996). The former Camp was subdivided into three areas (Areas A: Training Area, Area B: Other Lands, and Area C: Additional Acreage) for evaluating purposes based on former land use, terrain, and visual site inspection. Areas A and C were classified as having "confirmed" ordnance present. Area B was classified as "potential" for ordnance presence. Based on these recommendations the EE/CA investigation was initiated.

2.5 An EE/CA was conducted at the former Camp Ibis to characterize the presence of OE, analyze risk management alternatives, and recommend feasible OE risk reduction alternatives for the three AOIs identified in the ASR. The EE/CA investigation results indicated the presence of OE in several areas. As a result, the original AOI boundaries were modified in order to facilitate the appropriate selection of OE response alternatives. Four new sectors were delineated as Area AB, Area C1, Area C2, and Area C3 (Figure 2). The re-sectored AOI boundaries were based on UXO type, UXO distribution, and current and near future land use.

2.6 The U.S. Army Corps of Engineers (USACE) realizes various military training has been conducted on significant additional acreage surrounding this project site as well as the other former camps within the CAMA. Evaluation of these areas, although outside the scope of this EE/CA and associated action memorandum, will be considered as part of ongoing future investigation of the CAMA.

### **3.0 STATEMENT OF BASIS AND PURPOSE**

3.1 The purpose of this EE/CA Action Memorandum is to present the selected OE response actions for each of the sectors comprising the Camp. The basis for the selection of response actions was in accordance with the DERP FUDS and relevant U.S. Army regulations and guidance for OE programs. Based on the results of the completed EE/CA, which included a qualitative baseline risk evaluation and comparative analysis of potential OE response actions, the most appropriate alternative was selected for each of the four subareas. The USACE will implement site-wide institutional controls (IC), to include a public awareness program and installation of warning signs, for all areas. This selection was primarily driven by the absence of significant hazardous ordnance-related contamination coupled with an incomplete pathway for public exposure. As a result, risk

management strategies (IC components) are appropriate and a removal action is not warranted.

3.2 The final EE/CA Report describes the potential response alternatives that were evaluated for each of the AOIs within the site and presents the recommended response alternative. The BLM, State Fish and Wildlife Service, and State Historic Preservation Office have been actively involved in the project. The lead regulator, the California Environmental Protection Agency, Department of Toxic Substances Control (DTSC) has also been closely involved in all facets of the project and reviewed the EE/CA Report and subdocuments. Comments were received and addressed during multiple project team meetings held at the BLM offices in Needles, California. Following comment resolution, the DTSC concurs with the EE/CA selected alternatives detailed in the Final EE/CA Report.

3.3 The process for response action selection is documented in the Administrative Record for the site. The administrative record for this site is located at the San Bernardino County Library, Needles Branch, 1111 Bailey Avenue, Needles, California 92363. A copy of the Administrative Record is also available at USACE, Los Angeles District (CESPL), located at 915 Wilshire Boulevard, Los Angeles, California 90017.

#### **4.0 PROJECT JUSTIFICATION**

4.1 A variety of ordnance items were recovered within the four AOIs during the EE/CA field investigation conducted at the former Camp Ibis. The presence of UXO was confined to two AOIs (Area C2 and Area C3) from which a 37mm armor-piercing capped (APC) high explosive (HE) projectile and five M1 practice mines (fuzed with spotting charge) were recovered, respectively. Ordnance scrap was found in each of the four sectors and included:

- an inert practice grenade and three HE projectile fragments (Area AB),
- various M-series fuzing components, one expended 37mm projectile, two expended 75mm projectiles, and scattered HE projectile fragments (Area C1),
- five additional inert landmines, various M-series fuzing mechanisms, and HE projectile fragments (Area C2),
- various M-series fuzing components, remnants from 37mm, 75mm, and 105mm projectiles, and numerous HE projectile fragments (Area C3).

All of the recovered ordnance items were consistent with the historical usage of the former Camp Ibis.

4.2 The data collected during the EE/CA field investigation was used to perform a qualitative risk evaluation for assessing the OE risk to public safety and the environment at the former Camp Ibis. The qualitative risk analysis was completed based on the

USAESCH OE Risk Impact Assessment (OERIA) evaluation tool. Results of the evaluation concluded that the overall explosive public safety risk in Area AB is low indicating no substantial endangerment to public safety, welfare, and the environment. In Area C1 the risk was characterized as low to moderate. For Areas C2 (landmine area) and C3 (37mm HE projectile), where UXO presence was confirmed during the EE/CA, the overall explosive public safety risk was considered moderate. Public access to the entire site is basically unrestricted.

## **5.0 ALTERNATIVES CONSIDERED**

A non-time-critical removal action (NTCRA) was developed and evaluated to address the public safety risks associated with residual OE within the Camp. Several OE response action alternatives were considered for each of the AOIs investigated. The OE response action alternatives considered were:

- No DoD Action Indicated (NDAI);
- Institutional Controls (ICs);
- Surface Clearance of OE;
- Surface Clearance of OE with ICs;
- Clearance of OE to Depth; and
- Clearance of OE to Depth with ICs.

## **6.0 HIGHLIGHTS OF COMMUNITY PARTICIPATION**

6.1 During the former Camp Ibis project, a public meeting was at the start-up of field work (January 15, 2003) to conduct the EE/CA investigation. The public participation process was coordinated with DTSC and conducted in accordance with the State of California public participation requirements mandated by Senate Bill 47, the State Superfund reauthorization and pursuant to California Health and Safety Code (HSC) Sections 25358.7 and 25356.1 and 40 CFR Section 300. This included development of a project mailing list, development of a community profile, conduct of a baseline community survey, conduct of selected community interviews, preparation of a Community Relations Plan/Public Participation Plan (issued June 2002), and development and dissemination of fact sheets and public notices.

6.2 A second public meeting was held February 25, 2004 at the Needles High School auditorium to present the conclusions and recommendations of the Draft Final EE/CA to the public and to address any public concern. The meeting marked the beginning of the thirty-day period for public comment which was extended April 2, 2004. No concerns were identified during the meeting nor were any received during the review period. All the requirements for public involvement have been met.

## **7.0 COORDINATION SUMMARY**

7.1 Project activities for the former Camp Ibis EE/CA have been coordinated with the USAESCH, CESPL, BLM, and the State Regulatory Agency (DTSC) and local (San

Bernardino County and City of Needles) government officials. All phases from the work plans through the EE/CA Report were reviewed by USAESCH, CESPL, and made available to project stakeholders (DTSC, BLM, other property owners/public) via the project website ([www.projecthost.com](http://www.projecthost.com)) and the Administrative Record.

7.2 The initial Technical Project Planning (TPP) coordination meeting was conducted on June 20, 2000 to formally introduce the primary project stakeholders to the EE/CA process and solicit input and comment for development of the project WP. Representatives from DTSC as well as BLM were in attendance. Subsequent TPP meetings were held on January 30, 2001; April 26, 2001; and November 14, 2001. The culmination of these meetings was project team concurrence on the Final project WP.

7.3 The Draft Final EE/CA was made available to public review initially for a 30-day period in February 2004 and it was opened for comments during the public meetings. Fieldwork activities were also coordinated with the appropriate regulatory bodies including the State Historical Preservation Officer (SHPO) and the U.S. Fish and Wildlife Service to ensure that historical features, endangered species, and sensitive habitats were not adversely affected by OE survey and clearance activities. Documentation of both biology avoidance escort activities (primarily for protection of the endangered Desert Tortoise and in accordance with the USFS Biological Opinion) and archaeology survey findings (in accordance with SHPO and BLM) were produced under separate cover.

7.4 A soil sampling investigation was conducted coincident with the EE/CA field activities. Background and site characterization samples were collected and analyzed for select OE-related constituents. Table 1 presents the results of these soil sample analyses. All sample results were compared to the EPA Region IX Preliminary Remedial Goals (PRGs) dated 2/10/03. The results for all samples were below the established Industrial Soil Levels for Direct Contact Exposure Pathways indicating no risk from exposure to the soils at former Camp Ibis. The EPA IX PRGs are presented in Table 1, along with the sample results. Further details on the soil sampling efforts are documented in the Soil Sampling Report (Parsons, 2003). All aspects of the soil sampling investigation were coordinated with DTSC.

7.5 The lead regulatory agency, DTSC, was given several months to review the Draft Final EE/CA. Comments received from DTSC were addressed and resolved via multiple project team meetings held at the BLM offices in Needles, California. The Project Delivery Team met with DTSC before the public meetings in order to ensure concurrence with the recommended OE response actions. The DTSC concurs with the recommendations of the Final EE/CA (April 2004).

Key contacts for state officials included:

State Regulatory Agency – DTSC

Omoruyi Patrick, P.E. Project Manager

Daniel Cordero, Jr., Hazardous Substances Engineer/Military Facilities



## **8.0 SELECTION CRITERIA**

The selection criteria used to evaluate the six response action alternatives consist of the effectiveness in reducing the public safety risks, the implementability of the alternative, and the cost of implementing the alternative. The effectiveness criterion involved consideration of four criteria; protection of public safety and the environment, compliance with ARARs, long term effectiveness, and short term effectiveness. The implementability criterion involved consideration of six criteria; technical feasibility, administrative feasibility, availability of services and materials, property owner acceptance, local agency acceptance, and community acceptance. These criteria are discussed further in Section 6 and 7 of the Final EE/CA Report (Parsons, April 2004) and available in the project Administrative Record.

## **9.0 DESCRIPTION OF SELECTED REMEDIES**

9.1 The results of the risk evaluation for Area C1, Area C2, and Area C3 indicate a public safety risk is present. UXO was identified in Area C2 and Area C3 and public access to these sectors is not restricted. However, IC risk management strategies were evaluated and identified as both appropriate and effective given the absence of significant hazardous ordnance-related contamination. Although UXO presence was confirmed in Area C2, the insensitive nature of the UXO (practice antitank landmines) coupled with the limited public land use suggest risk management strategies (IC components) are appropriate and a removal action is not warranted at this time. Further, a subsurface removal action would likely do more environmental harm than good considering the sensitive desert ecosystem and critical habitat for the federally threatened desert tortoise.

9.2 Results of the risk evaluation indicated that there is no significant public safety risk associated with OE in Area AB. However, implementation of similar IC strategies (as selected for areas C1, C2, and C3) was selected by the EE/CA project team for Area AB as a prudent response action given the confirmed former military usage of the property.

9.3 In the event that site conditions change substantially in the future, such as the site is made tourist-friendly or attractive to visitors by BLM, the selected IC components may not be adequate to maintain public safety. This determination would be made through the recurring review process described in Section 11 below and removal actions would be reevaluated.

9.4 Table 2 presents the selected OE response alternative for each AOI within the former Camp. The site-wide IC components considered effective, implementable, and cost effective are the posting of warning signs, preparation and distribution of printed media, classroom education, visual media, establishment of exhibits/displays, creation of an internet website, newspaper articles/interviews, and establishment of an Ad Hoc committee. It is recommended that the local community establish the Ad Hoc committee. One IC component, fencing, was considered implementable on an AOI basis (Area C2)

but was not considered appropriate for the Camp as a whole. The total capital cost for implementation of the site-wide institutional controls is estimated at \$95,000 with an annual recurring cost of approximately \$12,500. The cost for implementation of each site-wide IC are presented in Table 3. Implementation procedures of the selected ICs are presented in the Final EE/CA (Parsons, April 2004).

**Table 1**  
**Soil Sampling Summary**  
**Former Camp Ibis**

Sample Type	Background Soil Samples						Surface Soil Samples						
	A-BG-01 04/07/03	A-BG-02 04/07/03	A-BG-03 04/07/03	A-BG-04 04/07/03	A-BG-04 RE <sup>1</sup> 04/21/03	B-BG-05 04/07/03	A-SS-19 04/08/03	A-FD-01 <sup>2</sup> 04/08/03	A-SS-21 04/16/03	A-SS-26 04/16/03	A-SS-28 04/08/03	C2-SS-2 04/21/03	C2-SS-3 04/21/03
<b>Metals by SH6010B, mg/kg</b>													
Aluminum	13880	11210	8120	12510	N/A	9220	5550	4080	4700 J	13880 J	10230	11280 J	15650 J
Arsenic	0.818 J	0.725 J	0.703 J	< 0.628 UJ	N/A	< 0.628 UJ	< 0.678 UJ	< 0.625 UJ	< 0.690 UJ	< 0.720 UJ	< 0.625 UJ	1.05 J	0.99 J
Copper	3.74	2.54	8.05	3.9	N/A	2.59	1.82	2.1	1.75	3.57	2.63	2.57	3.56
Lead	16.7	11.8	10.5	12.2	N/A	9.6	8.69 J	5.9 J	8.2	13.5	9.92	10.6	15
Magnesium	9.36 J	8.84 J	6.99 J	7.47 J	N/A	5 J	7.78 J	5.07 J	6.54 J	8.38 J	5.18 J	4.83 J	8.66 J
Zinc	7750	5270	4560	7030	N/A	4700	3010	2200	2680	7290	6870	7190	8600
	51.1 J	38 J	34.6 J	47.7 J	N/A	34.7 J	22.5 J	15.8 J	20.4 J	43.7 J	36.6 J	39.3 J	59.2 J
<b>General Parameters (Nitrate by EPA 365.4)</b>													
Nitrate, mg/kg	< 1.03 UJ	1.27 J	< 1.03 UJ	< 1.02 UJ	1.52	< 1.02 UJ	< 1.01 UJ	< 1.00 UJ	< 0.870 UJ	1.15 J	< 1.01 UJ	0.935 J	95.7
Total Phosphorus, mg/kg	1160	869	770	1090	N/A	1100	483	495	590	930	667	563	634
<b>Explosives by SH8310, µg/kg</b>													
HMX	N/A	N/A	N/A	N/A	N/A	N/A	< 80.0	< 80.0	< 80.0	< 80.0	< 80.0	< 80.0	< 80.0
RDX	N/A	N/A	N/A	N/A	N/A	N/A	< 80.0	< 80.0	< 80.0	< 80.0	< 80.0	< 80.0	< 80.0
1,3,5-Trinitrobenzene	N/A	N/A	N/A	N/A	N/A	N/A	< 80.0	< 80.0	< 80.0	< 80.0	< 80.0	< 80.0	< 80.0
1,3-Dinitrobenzene	N/A	N/A	N/A	N/A	N/A	N/A	< 80.0	< 80.0	< 80.0	< 80.0	< 80.0	< 80.0	< 80.0
Nitrobenzene	N/A	N/A	N/A	N/A	N/A	N/A	< 80.0	< 80.0	< 80.0	< 80.0	< 80.0	< 80.0	< 80.0
Tetryl	N/A	N/A	N/A	N/A	N/A	N/A	< 80.0	< 80.0	< 80.0	< 80.0	< 80.0	< 80.0	< 80.0
2,4,6-Trinitrotoluene	N/A	N/A	N/A	N/A	N/A	N/A	< 80.0	< 80.0	< 80.0	< 80.0	< 80.0	< 80.0	< 80.0
2-Amino-4,6-dinitrotoluene	N/A	N/A	N/A	N/A	N/A	N/A	< 80.0	< 80.0	< 80.0	< 80.0	< 80.0	< 80.0	< 80.0
4-Amino-2,6-dinitrotoluene	N/A	N/A	N/A	N/A	N/A	N/A	< 80.0	< 80.0	< 80.0	< 80.0	< 80.0	< 80.0	< 80.0
2,4-Dinitrotoluene	N/A	N/A	N/A	N/A	N/A	N/A	< 80.0	< 80.0	< 80.0	< 80.0	< 80.0	< 80.0	< 80.0
2,6-Dinitrotoluene	N/A	N/A	N/A	N/A	N/A	N/A	< 80.0	< 80.0	< 80.0	< 80.0	< 80.0	< 80.0	< 80.0
2-Nitrotoluene	N/A	N/A	N/A	N/A	N/A	N/A	< 80.0	< 80.0	< 80.0	< 80.0	< 80.0	< 80.0	< 80.0
4-Nitrotoluene	N/A	N/A	N/A	N/A	N/A	N/A	< 80.0	< 80.0	< 80.0	< 80.0	< 80.0	< 80.0	< 80.0
3-Nitrotoluene	N/A	N/A	N/A	N/A	N/A	N/A	< 80.0	< 80.0	< 80.0	< 80.0	< 80.0	< 80.0	< 80.0

1) In the interest of space, the prefix "IBIS-" has been left off of all sample IDs in this table.

2) A-FD-01 is a field duplicate of A-SS-19.

N/A - Not Applicable

J - Result is estimated due to associated QC problems.

UJ - Possible false negative result due to related QC problems

RE<sup>1</sup> - Sample was re-collected on 4/21 for nitrate only based on original analyses being performed outside of holding time

**Table 2**  
**Summary of Recommended Alternatives and Clearance Costs**

Site	Recommended Action	Clearance Acreage	Cost
Site AB	Site-Wide Institutional Controls	NA	NA
Site C1	Site-Wide Institutional Controls	NA	NA
Site C2	Site-Wide Institutional Controls	NA	NA
Site C3	Site-Wide Institutional Controls	NA	NA
Site-Wide IC	NA	NA	\$95,000/\$12,500 year
<b>Total</b>			<b>\$95,000</b> <b>\$12,500 year</b>

**Table 3**  
**Projected Costs for Recommended Institutional Control Components**

Institutional Control	Initial Cost	Annual Cost
Signage (Assume 25 signs at \$90/each)	\$2,250	\$1000
Permitting, Property Transfer and Land Use Update	\$15,500	\$5,000
Distribute Existing (Updated) Fact Sheet	\$1,000	None
Prepare and Distribute Second Fact Sheet	\$21,250	Minimal
Prepare & Distribute Videos	\$26,000	None
Classroom Education	\$1,500	\$3,000
Displays/Exhibits	\$15,500	None
Ad hoc Committee	\$2,000	\$1,000
Internet Website	\$10,000	Minimal
Newspaper Articles/Interviews	Minimal	Minimal
<b>TOTAL</b>	<b>\$ 95,000</b>	<b>\$12,500</b>

9.5 Based on the estimated costs presented in this Action Memorandum (See Table 3), the appropriate approval level for this project is the Major Subordinate Command (MSC) Commander.

## **10.0 TRADE OFF ANALYSIS**

The alternatives recommended for the four AOIs located at the former Camp Ibis are the best alternatives as determined from the available historical records and data gathered in support of the Final EE/CA Report (Parsons, April 2004). Also, these alternatives were developed in concert with USAESCH, CESPL, DTSC, BLM, and other project stakeholders. Mitigative measures will be implemented to ensure that no resources are impacted due to the actions proposed.

## **11.0 RECURRING REVIEWS**

As described in Appendix F of the Final EE/CA Report, recurring reviews at the former Camp Ibis will be performed at 5-year intervals after the implementation of the selected OE response action (Site-Wide IC). This effort will be performed to determine if the IC components continue to be effective for protection of human health, safety, and the environment. Between recurring reviews the BLM will ensure that the onsite warning signs are maintained and replaced as necessary. In addition, the educational video and brochures will be reviewed/updated for changes in conditions.

The recurring reviews will provide an opportunity to assess the applicability of new technology for addressing previous technical impracticability determinations. The review will evaluate specific factors that may impact the continued effectiveness of the IC response. These factors may include such things as changes in physical conditions at the former Camp Ibis site or changes in public accessibility. The cost to conduct the first recurring review is estimated to range from \$20,000 to \$35,000 utilizing two primary investigators and an OE safety escort for one week in the field. If no changes have taken place, the AOIs will be continually monitored at the specified intervals. A Recurring Review report will be prepared documenting the findings and recommendations. Subsequent recurring reviews (years 10 through 25) will be conducted in a similar manner with associated costs anticipated to increase 8 to 10 percent per visit.

## **12.0 DOCUMENTATION OF SIGNIFICANT CHANGES**

If the actions outlined in this EE/CA Action Memorandum are delayed or not taken at the former Camp Ibis, the existing low to moderate risk at this site will not be mitigated. Potential development in support of tourism by BLM may result in the future given the historic significance of the site and uniqueness of the Camp's rock alignments. The site is currently under evaluation for inclusion on the National Registry of Historic Places. Any significant changes to this document will be notified to the public by USACE.

### **13.0 RESPONSIVENESS SUMMARY**

A responsiveness summary for the public meeting of February 25, 2004 is not necessary as no formal comments were received either at the meeting or during the 30-day public comment period. DTSC comments on the Draft Final EE/CA Report were resolved via several project team meetings conducted at the BLM offices in Needles, California prior to the Final EE/CA Report issuance in April 2004.